

Via ECFS Filing

February 20<sup>th</sup>, 2019

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

RE: Certification of CPNI Filing, EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to section 64.2009(e) of the Commission's rules<sup>1</sup> and the Commission's *Public Notice*, DA 08-171, dated January 29, 2008 in the above-captioned matter, AMP Networks, LLC d/b/a PressOne, an interconnected voice over Internet Protocol service provider, hereby submits its 2018 compliance certificate and a statement explaining how the Company's operating procedures ensure compliance with the referenced regulations.

By the attached Certificate and my signature below, I hereby certify to the Commission that AMP Networks, LLC d/b/a PressOne has established, and strictly follows, policies and operating procedures to fully comply with section 64.2009 of the Commission's rules governing Customer Proprietary Network Information ("CPNI").

AMP Networks, LLC d/b/a PressOne has established policies, which expressly prohibit release of CPNI to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Each employee receives an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require my approval; I am responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

Questions regarding this matter may be directed to me.

Sincerely,

AMP NETWORKS, LLC d/b/a PRESSONE

Allan Schwartz

Executive Vice President

<sup>1</sup> 47 C.F.R. §64.2009(e).

**Annual 47 C.F.R. S: 64.2009(e) CPNI Certification  
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for Calendar Year 2018

Date filed: February 20<sup>th</sup>, 2019

Name of company covered by this certification: AMP Networks LLC dba PressOne.

Form 499 Filer ID: 826349

Name of signatory: Allan Schwartz

Title of signatory: Executive Vice President

I, Allan Schwartz, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. S: 64.2001 *et seq.*

Attached to this certification is a transmittal letter containing an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken, nor been compelled to take, any actions<sup>1</sup> against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Signed

AMP Networks, LLC d/b/a PressOne

A handwritten signature in black ink, appearing to read "Allan Schwartz", written over a horizontal line.

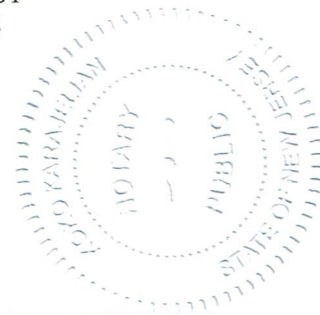
Allan Schwartz  
38-31 Crescent Street, 2<sup>nd</sup> Floor  
Long Island City, NY 11101  
Telephone: (718)360-1234  
Facsimile: (718)360-1212

State of New Jersey  
County of Bergen

On this 26th day of February 2019.

Notary: Koko Karajelian

A handwritten signature in black ink, appearing to read "Koko Karajelian", with an "x" mark to its left.



<sup>1</sup> Proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers.